

### Remarks

Claims 13-14, 16-26, and 28-62 are currently pending. Reconsideration of the pending claims is respectfully requested in view of the following remarks.

#### 35 U.S.C. 103(a)

The Examiner has rejected claims 13, 14, 16-26 and 28-62 under 35 U.S.C. 103(a) as obvious over EP 807703 in view of Shrier et al. (USPN 6,172,590). The applicants respectfully traverse this rejection.

EP 807703 discloses a nonwoven fabric cloth substrate with superior insulating properties that is useful for printed wiring boards and that is impregnated with a resin varnish. As conceded by the Examiner, EP 807703 is silent about an inorganic binder. Therefore, EP 807703 does not disclose thermal-resistant synthetic fibers intersecting each other forming intersections, wherein the thermal-resistant synthetic fibers are bound with the inorganic binder at the intersections as required by independent claims 13, 25, 39, and 51.

Shrier does not cure the deficiencies of EP 807703. Shrier discloses an electrical protection device utilizing a precision gap between two electrically conductive members attached to an electrically insulating substrate to provide over-voltage protection to an electrical device. Shrier discloses that “the glass materials useful in this invention are likewise glass materials which have been used as binders in variable voltage materials such as sodium silicate.” See col. 7, lines 36-38. However, Shrier does not disclose thermal-resistant synthetic fibers intersecting each other forming intersections, wherein the thermal-resistant synthetic fibers are bound with the inorganic binder at the intersections as required by independent claims 13, 25, 39, and 51. Therefore, the combination of EP 807703 fails to teach or suggest every element of claims 13, 25, 39, and 51.

Furthermore, there is no motivation to combine EP 807703 with Shrier. EP 807703 discloses a nonwoven fabric cloth substrate with superior insulating properties. However, in contrast to EP 807703, when an overvoltage is applied by a surge or a discharge to the device of Shrier, resistance is dropped (non-linear resistance) and the overvoltage immediately is transmitted to the ground. See col. 4, lines 39-44 of Shrier. Accordingly, in the part cited by the Examiner, the glasses used in Shrier are for the purpose of obtaining desired dielectric/over-voltage protection

properties. Since the purposes of EP 807703 and Shrier are so different, there is no motivation for one of skill in the art to combine their disclosures.

For at least these reasons, EP 807703 in view of Shrier fails to teach or suggest the invention of independent claims 13, 25, 39, and 51. As the remaining claims are dependent thereon, they are also not taught or suggested.

### Conclusion

Applicants believe that the claims pending in this patent application are in condition for allowance. Favorable consideration is respectfully requested. If any further questions arise, the Examiner is invited to contact Applicants' representative at the number listed below.

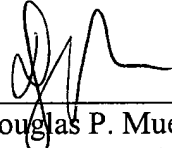
Respectfully submitted,

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Dated: \_\_\_\_\_

May 20, 2004

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